REMARKS

In view of the remarks to follow, applicants respectfully request reconsideration and early allowance of this application.

Claims 1-118 are pending in this application.

The Examiner rejected claims 1-4, 7, 10, 12, 17, 21, 25, 29, 33, 51-52, 57-61, 64, 67, 69, 74, 78, 82, 86, 90, 108, 111, and 115-118 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,567,800 B1 (hereinafter "Barrera").

The Examiner rejected claims 5, and 62 under 35 U.S.C. § 103(a) as being unpatentable over Barrera in view of U.S. Patent No. 6,311,058 B1 (hereinafter "Wecker").

The Examiner rejected claims 6, 8-9, 14-16, 18-20, 22-24, 26-28, 30-32, 63, 65-66, 71-73, 75-77, 79-81, 83-85, 87-89, and 114 under 35 U.S.C. § 103(a) as being unpatentable over Barrera in view of U.S. Patent No. 6,394,354 B1 (hereinafter "Wilz").

The Examiner rejected claims 11, 13, 53, 68, 70, and 109 under 35 U.S.C. § 103(a) as being unpatentable over Barrera in view of U.S. Patent No. 6,311,214 B1 (hereinafter "Rhoads").

The Examiner rejected claims 34-48, 50, 54, 56, 91-106, 110, and 113 under 35 U.S.C. § 103(a) as being unpatentable over Barrera in view of U.S. Patent No. 6,505,212 B1 (hereinafter "Nakano").

The Examiner rejected claims 55, and 112 under 35 U.S.C. § 103(a) as being unpatentable over Barrera in view of Nakano and Wilz.[*]

The Examiner's rejections are respectfully traversed.

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[*] Applicants respectfully submit that the Examiner's reasons for rejecting claims 55 and 112 appear to be directed to the subject matter of claims 56 and 113, because the rejection references the feature of retrieving web site data pseudo-randomly. This feature is present in claims 56 and 113 but not in claims 55 and 112. Applicants have, therefore, responded based upon the assumption that the Examiner intended to list claims 56 and 113 rather than claims 55 and 112. Applicants note that the Examiner also rejected these claims in view of Nakano citing the claims being directed to generating "multimedia information." Multimedia information is a feature of claims 55 and 112, but is not a feature of claims 56 and 113. During a brief telephone call between the Examiner and applicants' representative, Peter Withstandley (Reg. No. 53,784), the Examiner indicated that this interpretation was acceptable for the purposes of a reply.

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Independent claims 1, 55-58, and 112-118 are directed to various methods and systems for "generating a web site." According to applicants' specification, generation of a web site refers to "creating, updating and maintaining a quality web site" (Specification, p. 5, ¶ 1).

The Examiner rejected the independent claims of applicants' invention, citing U.S. Patent No. 6,567,800 B1 (hereinafter "Barrera"). The Examiner contends that Barrera anticipates the method of generating, or creating, a web site claimed by applicants. However, contrary to the Examiner's contention, applicants respectfully submit that nowhere in Barrera is it disclosed or suggested to create, update or maintain a website. Barrera is not related to creation of a web site, but rather describes a system and method of searching web site content.

Barrera describes a system and method for searching information stored on a network. In the system of Barrera, "website content is automatically gathered and stored using a software application called a spider" (col. 4, lines 4-6). "Upon searching a page, Vspider returns information such as the identity of the author of the page, the date on which the page was created, its size and some analysis of its textual content" (col. 4, lines 26-29). In order to facilitate the search methods of Barrera, "stored website content is correlated with a category" (col. 4, line 58). A user, operating a search computer coupled to the database of website content can search the database in two steps. First, "A category selection is received from a user," and second "A content search request (e.g., a keyword search request) for websites in the selected category is received from the user" (col. 4, lines 59-61). The system of Barrera then performs a "content search on the stored website content that is correlated with the selected category," and "The results of this category-content search are sent to the user" (col. 4, lines 62-65).

The Examiner contends that claim 1 of Barrera discloses a method of generating a web site. However, claim 1 of Barrera merely discloses, as is described in greater detail above, a "method of searching for information stored at websites." In particular, regarding the feature of "generating a

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web site," the Examiner cites the step in claim 1 of Barrera of "retrieving website content through a network" as anticipating applicants' methods and systems for "generating a web site."

Applicants respectfully submit that "retrieving website content through a network," is more fully described by Barrera as a step in which "website content is automatically gathered and stored using a software application called a spider" (col. 4, lines 4-6). Applicants respectfully submit that this step does not constitute generating, or creating, a web site, as described by applicants' specification. Moreover, applicants respectfully submit that the entire disclosure of Barrera fails to make any mention whatsoever of generating, or creating, a website.

Applicants respectfully submit that independent claims 1, 55-58, and 112-118 are patentable over Barrera at least because Barrera fails to show or suggest generating, or creating a web site as claimed. Dependent claims 2-54, and 59-111 depend from independent claims 1 and 58, respectively, and are patentable at least because claims 1 and 58 are patentable.

The Examiner additionally rejected applicants' independent claims 55 and 112 under 35 U.S.C. § 103 as being unpatentable over Barrera, in view of Nakano and Wilz. As discussed in the footnote on page 2 of this paper, applicants believe that the Examiner intended to reject claims 56 and 113 as unpatentable over Barrera in view of Wilz. Applicants have prepared the following reply based upon this belief regarding the Examiner's rejection.

Applicants respectfully submit that independent claims 56 and 113, which are directed to methods and systems for generating, or creating, a web site, including the step of

> "retrieving web site data in accordance with the generated
> description of the web site pseudo-randomly from a predetermined
> web site data subset corresponding to at least a portion of the
> description of the web site,"

are patentable over the combination of Barrera and Wilz. Applicants respectfully submit, as shown above with respect to, e.g., independent claim 1, that Barrera fails to show or suggest generating, or creating, a web site. The Examiner concedes that Barrera does not disclose or

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suggest the feature of retrieving web site data pseudo-randomly. The Examiner contends that Wilz teaches a quasi-random information display at column 22, lines 30-33 of Wilz.

Wilz is directed to an Internet-based system and method for routing, tracking and delivering packages using URL-encoded bar code symbols. Applicants respectfully submit that Wilz makes no mention whatsoever of creating or generating a web site. Applicants respectfully submit that it would not have been obvious to one in the art to combine any feature of Wilz with the Internet searching system of Barrera. Additionally, Applicants respectfully submit that the combination of Barrera and Wilz would still fail to show or suggest all of the features of applicants' claims 56 and 113. In addition to Barrera failing to show or suggest creating, or generating, a web site, Wilz fails to show or suggest the feature of retrieving web site data pseudo-randomly in accordance with a generated description of a web site. Wilz, at column 22, lines 30-33 merely describes figure 6B of that patent, which shows a printed display layout for a URL-encoded menu. Wilz states

> "the printed information display blocks will be arranged in a single column down each printed sheet. In other embodiments, the printed information display blocks will be arranged in a two or more rows or columns. In yet other embodiments, the layout of such information display blocks may be of random or quasi-random structure."
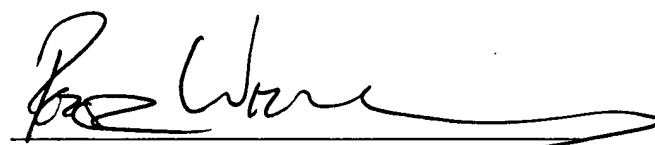
The Examiner cited the foregoing passage of Wilz as teaching "retrieving web site data in accordance with the generated description of the web site pseudo-randomly . . ." Applicants respectfully submit that, contrary to the Examiner's contention, Wilz fails to show or suggest retrieving web site data pseudo-randomly as required by applicants' independent claims 56 and 113. Rather, Wilz describes a method of printing display blocks on a sheet, in which the blocks may be displayed in a single column or in a "quasi-random structure." Additionally, as discussed above, neither Wilz nor Barrera show or suggest creating, or generating, a web site.

Accordingly, applicants respectfully submit that applicants' independent claims 56 and 113 are patentable over the combination of Barrera and Wilz[*].

In the event that the Examiner disagrees with any of the foregoing comments concerning the disclosures in the cited prior art, it is requested that the Examiner indicate where, in the reference, there is the basis for a contrary view.

In view of the foregoing remarks it is believed that all of the claims in this application are patentable over the prior art. Early and favorable consideration of this application is respectfully requested.

Respectfully submitted,
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[*] Note, the Examiner rejected claims 55 and 112 in view of Barrera, Nakano, and Wilz. However, as addressed above, applicants believe that the Examiner intended to reject claims 56 and 113 due to the reasons for rejection described in the Office Action. As such, Nakano was not addressed with respect to this rejection.